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10 *Attorneys for Fire Victim Trustee*

11 **UNITED STATES BANKRUPTCY COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

13 In re:  
14 **PG&E CORPORATION,**

15 -and-

16  
17 **PACIFIC GAS AND ELECTRIC**  
18 **COMPANY,**

19 **Debtors.**

- 20 ☐ Affects PG&E Corporation  
21 ☐ Affects Pacific Gas and Electric Company  
22 ☒ Affects both Debtors

23 *\* All papers shall be filed in the Lead Case,*  
24 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF CATHY YANNI  
IN SUPPORT OF EX PARTE  
MOTION OF THE FIRE VICTIM  
TRUSTEE TO FILE CONFIDENTIAL  
CLAIMANT SUBMISSION TO  
FIRE VICTIM TRUST UNDER SEAL**

[No Hearing Requested]

25 I, Cathy Yanni, hereby declare under penalty of perjury that the following is true to the best  
26 of my knowledge, information, and belief:

27 1. I became Successor Trustee of the PG&E Fire Victim Trust (“Trustee”) on July 1,  
28 2022, pursuant to Section 5.2(d) of the Fire Victim Trust Agreement [Docket No. 8750-1). I am

1 duly authorized to make this Declaration (the “**Declaration**”) on behalf of the PG&E Fire Victim  
2 Trust (the “**Trust**,” and its beneficiaries, the “**Fire Victims**”). Unless otherwise stated in this  
3 Declaration, I have knowledge of the facts set forth herein and, if called as a witness, I would testify  
4 thereto.

5         2. I am an attorney at law licensed to practice law in the state of California. Prior to  
6 becoming Trustee, I served as the Court-appointed Claims Administrator for the Trust under the  
7 *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19,*  
8 *2020* [Docket No. 8048] and, prior to that, pursuant to this Court’s *Order Granting Application of*  
9 *The Official Committee of Tort Claimants Pursuant to 11 U.S.C. Sections 1103 and 363 and Fed.*  
10 *R. Bankr. P. 2014 and 5002 to Retain and Employ Cathy Yanni as Claims Administrator Nunc Pro*  
11 *Tunc to January 13, 2020* dated April 14, 2020 [Docket No. 6759]. Before serving as the Claims  
12 Administrator, I served as the Court-appointed Administrator of the Wildfire Assistance Program  
13 pursuant to this Court’s *Supplemental Order (A) Approving Appointment of Administrator and*  
14 *Establishing Guidelines for the Wildfire Assistance Program and (B) Granting Related Relief* dated  
15 June 5, 2019 [Docket No. 2409].

16         3. I submit this Declaration in support of the *Ex Parte Motion of the Fire Victim Trustee*  
17 *to File Confidential Claimant Submission to Fire Victim Trust Under Seal* (the “**Sealing Motion**”),  
18 filed concurrently herewith, which seeks entry of an order (i) authorizing the Trustee to file an  
19 unredacted copy of a certain claimant’s confidential submission to the Fire Victim Trust (the  
20 “**Confidential Claimant Submission**”) under seal, and (ii) directing that the unredacted copies of  
21 the Confidential Claimant Submission provided to the Court shall remain under seal and confidential  
22 and not be made available to anyone without the consent of the Trustee and the claimant or further  
23 order from the Court

24         4. I am generally knowledgeable and familiar with the day-to-day operations of the  
25 Trust, including the Fire Victim Claims asserted by Sayegh Brothers, Inc. (“**Sayegh Brothers**”) and  
26 the Trust’s determination of such Fire Victim Claims. I also am knowledgeable and familiar with  
27 the *Motion To Determine If The Trustee Modification Of The Claim Resolution Procedure Was*  
28 *Approved By The Bankruptcy Court And If Not So Approved To Grant Requested Relief Under 11*

1 U.S.C. § 105(a) and § 1142(a) B.L.R. 9014-1 (b)(3) [Docket No. 14319] (the “Sayegh Brothers  
2 Motion”) filed by Sayegh Brothers and the Trustee’s objection (the “Objection”) to the Sayegh  
3 Brothers Motion. I am authorized to submit this Declaration on behalf of the Trust.

4 5. The facts set forth in this Declaration are based upon my personal knowledge, my  
5 review of relevant documents, and information provided to me by the Trust’s legal advisors. If called  
6 upon to testify, I would testify to the facts set forth in this Declaration.

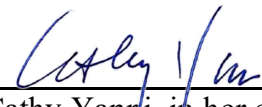
7 6. I believe that the terms of the Fire Victim Trust Agreement and the Fire Victim Trust  
8 Claims Resolution Procedures *require* the Trust to keep confidential *all* submissions to the Trust by  
9 claimants in support of their Fire Victim Claims.

10 7. In addition, I believe that, while the Confidential Claimant Submission provides  
11 support for one of the alternative arguments presented in the Objection, the information contained  
12 in the Confidential Claimant Submission does not go to the heart of the determination to be made  
13 by the Court. I also believe that there is a significant public interest in upholding the confidentiality  
14 provisions in the Trust Documents that protect private claim-related information of more than  
15 70,000 Fire Victims. .

16 8. For these reasons, I believe the sealing of the Confidential Claimant Submission is  
17 warranted.

18 I declare under penalty of perjury, as set forth in 28 U.S.C. § 1746, that the foregoing is true  
19 and correct to the best of my knowledge, information, and belief.

20  
21 Executed this 2<sup>nd</sup> day of April, 2024, in San Francisco, California.

22  
23  
24 By:   
25 Cathy Yanri, in her capacity as  
26 Trustee of the PG&E Fire Victim Trust  
27  
28